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MEMBER: N.Y. & N.J. BAR

June 17, 2021

Honorable Laura T. Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: **United States v. Constantinescu, et al., 19-Cr-651 (LTS)**
Adjournment of Scheduled Status Conference for David Georgescu (Defendant #25)

Dear Judge Swain:

On behalf of defendant David Georgescu and with the Government's consent, we respectfully move the Court for a 30-day adjournment of the status conference that is currently scheduled for July 2, 2021 at 12:00 pm.

The Defense has still not received the pole camera video in useable format, as we raised with the Court at the status conference on May 7, 2021. However, we understand that the Government is working with the Coordinating Discovery Attorney to solve the accessibility problem. Insofar as the parties are actively engaged in plea negotiations that, at this time, we believe cannot be concluded until Mr. Georgescu has been able to review the pole camera video, we respectfully conclude that an adjournment of the scheduled conference is warranted.

The defense consents to the exclusion of time from speedy trial calculations pursuant to 18 U.S.C. § 3161(h)(7)(A) for the purpose of continued plea negotiations until the next status date set by the Court.

Respectfully submitted,

/s/

Donna R. Newman

Cc: All counsel of record via ECF

The foregoing request for an adjournment is granted. The next pretrial conference is hereby scheduled for August 2, 2021 at 12:00pm. The parties shall notify Chambers by email on or before July 19, 2021 as to whether they request to proceed remotely or in person. The Court finds pursuant to 18 USC section 3161(h)(7)(A) that the ends of justice served by an exclusion of the time from today's date through August 2, 2021, outweigh the best interests of the public and the defendant in a speedy trial for the reasons stated above. Docket entry 719 is resolved.
SO ORDERED.

6/17/2021

/s/ Laura Taylor Swain, Chief USDJ